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Laura A. Sykora

Manager Regulatory Affairs-VA/TN

2003 OCT -6 AM 11:30

T.R.A. DOCKET ROOM

Sprint Corporation

14111 Capital Boulevard
Wake Forest, NC 27587-5900
Mailstop NCWKFR0303
Voice 919 554 7323
Fax 919 554 7595
laura.sykora@mail.sprint.com

October 3, 2003

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RE: Docket No. 03-00502, Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of
Tenn. Code Ann. § 65-21-114

Dear Director Jones:

Attached is an Addendum to Sprint's response to the Tennessee Regulatory
Authority's Notice of Filing dated September 16, 2003 in the above-referenced docket.
The Addendum provides a more detailed response to Question 1.

If you have questions regarding this information, please contact me at 919-554-
7323 or Kaye Odum at 919-554-5277.

Sincerely,

Laura A. Sykora

Attachment

C: Kaye Odum

ADDENDUM TO
Sprint's Response to TRA Data Request Dated 9/16/03 Re:
Workshop to Gather Information from the Telecommunications
Industry Related to Preventing Violations of
Tenn. Code Ann. § 65-21-114(a)

1. Describe the manner in which you are able to provide telecommunications Service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response:

Sprint Communications Company L.P.—Sprint's CLEC provides service to end-users through a third-party vendor. Sprint sends its call records to this third-party provider which processes these records through a program so that an intra-county call is not billed as toll. Since BellSouth ultimately provides dial-tone for Sprint's CLEC customers, BellSouth populates the statewide TAR code database with Sprint's CLEC's ANIs.



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

October 3, 2003
Via Fax and Overnight Delivery

Mr. Ron Jones, Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

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2003 OCT -6 AM 11:29

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Custom Teleconnect, Inc.**

Dear Mr. Jones:

Custom Teleconnect, Inc. submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Custom Teleconnect, Inc. has no presubscribed customers in Tennessee. All calls are operator treated from pay telephones or hospitality locations and are billed via LEC billing through a third party billing aggregator. Local calls would not normally route through the company if the customer follows the dialing instructions on the phone or tent card. To the extent that customers occasionally dial local calls as if they are long distance, Custom Teleconnect handles these incidental calls and bills them like any other toll calls. The company does not have the data bases necessary to identify intracounty calls on an NPA-NXX basis. If any customer calls to complain, identifying a billed call as intracounty, Custom Teleconnect would credit the entire charge for the call, including the operator handling charges that would otherwise apply even if the call usage had been \$0.00. Custom Teleconnect has received no such complaint to date.

The operational difficulties and expense of implementing real time intracounty toll free calling for operator handled calls are a true impediment for small competitors. The gains to the public would be miniscule compared to the cost. Custom Teleconnect suggests a mileage surrogate for small companies would be a reasonably inexpensive approach that could be easily implemented.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at mbyrnes@tminc.com

Sincerely,


Monique Byrnes
Consultant to Custom Teleconnect, Inc.

cc: M. Cauton, Custom Teleconnect
File: Custom Teleconnect - TN
TMS: TNx0302

TECHNOLOGIES MANAGEMENT, INC.

210 North Park Avenue

Winter Park, Florida 32790-0200

Telephone: (407) 740-8575

Fax: (407) 740-0613

FACSIMILE COVER SHEET

DATE: October 3, 2003

TO: Ron Jones, Director - TN Regulatory Authority

Telephone: 615.741.2904

Fax: 615.532.4698

ACCOUNT CODE

FROM: MONIQUE BYRNES

TECHNOLOGIES MANAGEMENT, INC.

PHONE: (407) 740-8575 **FAX:** (407) 740-0613

Please find the responses to county-wide calling inquiry for:

ACN Communication Services, Inc.

Z-Tel Communications, Inc.

Custom Teleconnect, Inc.

☐ Fax Only ☐ Fax & Mail

Billing \$ _____

Pages Sent (including cover)

CC:

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communications is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the U.S. Postal Service. Thank you.



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Via Fax and Overnight Delivery

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

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2003 OCT -6 AM 11:27

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Z-Tel Communications, Inc.**

Dear Mr. Jones:

Z-Tel Communications, Inc. submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Z-Tel Communications, Inc. is authorized to provide local and long distance telecommunications services in Tennessee, and is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

Z-Tel subscribes to the BellSouth TAR database and utilizes that information to comply with county-wide calling in Tennessee. This arrangement works smoothly and has not resulted in any known complaints.

Although this process works smoothly, the Company suggests that the TRA delineate criteria wherein traditional telecommunications boundaries are utilized including rate centers and exchanges. The company also requests that information be provided to the legislature regarding the onerous nature of compliance, that counties are not telecommunications boundaries and some telecommunications industry standard be imposed in lieu of county-wide calling.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via email at mbyrnes@tminc.com

Sincerely,

Monique Byrnes
Consultant to Z-Tel Communications, Inc.

cc: T. Seat - Z-Tel
File: Z-Tel - TN
TMS: TN0300y

TECHNOLOGIES MANAGEMENT, INC.
210 North Park Avenue
Winter Park, Florida 32790-0200
Telephone: (407) 740-8575
Fax: (407) 740-0613

FACSIMILE COVER SHEET

DATE: October 3, 2003

TO: Ron Jones, Director - TN Regulatory Authority

Telephone: 615.741.2904

Fax: 615.532.4698

ACCOUNT CODE

FROM: MONIQUE BYRNES

TECHNOLOGIES MANAGEMENT, INC.
PHONE: (407) 740-8575 **FAX:** (407) 740-0613

Please find the responses to county-wide calling inquiry for:

ACN Communication Services, Inc.

Z-Tel Communications, Inc.

Custom Teleconnect, Inc.

☐ Fax Only ☐ Fax & Mail

Billing \$ _____

Pages Sent (including cover)

CC:

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communications is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the U.S. Postal Service. Thank you.



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October 3, 2003
Via Overnight Delivery

T.R.A. DOCKET ROOM

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Globalcom, Inc.**

Dear Mr. Jones:

Globalcom, Inc., submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Globalcom is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

As a switchless reseller in Tennessee, Globalcom utilize the services of underlying facilities based interexchange carriers. Therefore, Globalcom is dependent upon the identification of toll free calling based on the systems and databases of the underlying carriers.

Globalcom has no suggestions as to how the proposed workshop should proceed, but offers any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at croesel@tminc.com.

Sincerely,

Carey Roesel
Consultant

cc: Eric Harstad
File: Globalcom - TN
TMS: Globalcom TNx0301



210 N. Park Ave.
Winter Park, FL
32789

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Winter Park, FL
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October 3, 2003

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Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

TRA DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of ACN Communication Services, Inc.**

Dear Mr. Jones:

ACN Communication Services, Inc. submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

ACN Communication Services, Inc. is authorized to provide long distance telecommunications services in Tennessee, and is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

As a switchless reseller the company has been dependent upon the databases and systems of its underlying carrier. However, the company has recently subscribed to the TAR database offered by BellSouth for another state and is currently arranging for such a subscription in Tennessee. This will assist the company in its compliance efforts.

The company has no suggestions as to how the proposed workshop should proceed, but will offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.
Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to ACN Communication Services, Inc.

cc: D. Gonos, ACN
File: ACN - TN
TMS: TN0304x



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Winter Park, FL
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October 3, 2003
Via Fax and Overnight Delivery

2003 OCT -6 AM 11:23

TRA DOCKET ROOM

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of American Long Lines, Inc.**

Dear Mr. Jones:

American Long Lines, Inc. (ALL) submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

ALL is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

As a switchless reseller in Tennessee, ALL utilize the services of underlying facilities based interexchange carriers. Therefore, ALL is dependent upon the identification of toll free calling based on the systems and databases of the underlying carriers. Currently the primary underlying carrier of ALL in Tennessee is Global Crossing.

ALL has no suggestions as to how the proposed workshop should proceed, but offers any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at croesel@tminc.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Carey Roesel", is written over a horizontal line.

Carey Roesel
Consultant

cc: Doug Derstine
File: ALL - TN
TMS: ALL TNx0301

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2003 OCT -6 AM 11:23

OCTOBER 3, 2003
T.R.A. DOCKET ROOM



One Discovery Square **VIA Overnight Mail**

12010 Sunset Hills Road
Reston, Virginia, 20190 USA

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

(T) 703 766-3100

(F) 703 766 3102

www.teleglobe.com

Re: Workshop to Gather Information from the Telecommunications
Industry Related to Preventing Violations of Tenn. Code Ann. § 65-
21-114, Docket No. 03-00502

Dear Mr. Jones:

Teleglobe America Inc. ("Teleglobe America") is in receipt of the Notice of Filing of September 16, 2003, subject as above, addressed to Teleglobe USA Inc. (copy attached). Teleglobe USA Inc. filed for bankruptcy in May 2002 and to our knowledge is no longer providing telecommunications services.

Our company, Teleglobe America, now owns many of the telecommunications assets formerly owned by Teleglobe USA Inc. Teleglobe America has had a request pending at the Tennessee Regulatory Authority since August 11, 2003 to obtain authority in its own name to operate in Tennessee. That request has not yet been acted upon, so Teleglobe America has not yet begun offering intrastate services in Tennessee. Therefore, we have no information to provide for this workshop.

Please contact me at (703) 766-3061 if you have any questions or if I can be helpful in any way.

Sincerely,

Rogena Harris

Enclosure



Focused on you.

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T.R.A. DOCKET ROOM

September 30, 2003

Toll Free 888-275-0777
Tel. 478-475-9800
Fax. 478-475-9988
www.accesscomm.com

Suite 107
4885 Riverside Drive
Macon, GA 31210

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Pkwy.
Nashville, TN 37243-0505

re: Docket No. 03-00502

Dear Director Jones:

Access Integrated Networks, Inc. (AIN) submits the following responses to the inquiries contained in the Authority's September 16, 2003 Notice of Filing in the above-mentioned docket.

- Inquiry: Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Reply: Access Integrated Networks receives Optional Daily Usage File (ODUF) information from the incumbent telephone company. This usage information is compared to call routing tables to determine which calls are made between two points in the same county in Tennessee and therefore classified as toll-free.

- Inquiry: Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

Reply: None.

- Inquiry: Provide a suggestion for how this workshop should proceed.

Reply: AIN has no suggestions at this time.

Please feel free to contact me should you have any questions or need additional information.

Sincerely,

Mark A. Ozanick, Senior Regulatory Analyst



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T.R.A. DOCKET ROOM

October 2, 2003,

(I only received the notice of filing 9-30-2003)

Docket No.: 03-00502

IN RE: Workshop to gather information from the Telecommunications Industry Related to Preventing Violations of TENN. Code ANN. 65-21-114.

I am not currently taking steps to enforce Tenn. Code Ann. 65-21-114(a) at this time as I am not yet switching traffic in Tennessee.

However, if I were switching traffic I would use dialing plans and digits routing to assure that all calls between two end users in the same county would not be charged. This may be simplistic but I believe that this could be done. Of course all IOC's, CLECS, & ILEC's would have to be agreeable to Bill and Keep when crossing territories included in a single county.

The only issue that might arise would be if a LATA split a county. Deciding who would incur cost of the traffic passing through LATA boundaries could be difficult due to interconnection agreements between CLEC's, ILEC's and IOC's etc.

Suggestion - Insist on Bill and Keep between all parties providing telecommunications service within any county.

Respectfully

Eddie Martin

VP Telecom

Dixie-Net Communications

P.O. Box 28

Ripley, Ms. 38663



Skyline

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OCT -6 AM 10:20
T.R.A. DOCKET #03-00502

Skyline Telephone Membership Corporation
CORPORATE OFFICES

1200 N.C. Highway 194 North
Post Office Box 759
West Jefferson, NC 28694-0759
Telephone (336) 877-3111 • 800-759-2226
Fax (336) 877-2020 • Website: www.skyline.org

October 3, 2003

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
RE: Docket No. 03-00502

To Whom It May Concern:

The purpose of this letter is to respond to the docket titled "Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tennessee Code Ann. 65-21-114."

- a) Skyline Telephone Membership Corporation (STMC) provides local EAS calling in Shady Valley (423-739) located in Johnson County, Tennessee, to Mountain City (423-727) which is also located in Johnson County, Tennessee. There are residents located in the Butler exchange (423-768) and the Damascus exchange (276-475) that reside in Johnson County, Tennessee.

In order to comply with Tenn. Code Ann. 65-21-114, STMC is making preparations to participate in the Tennessee state mandated County Wide Calling service. STMC is taking the necessary steps to participate in the state-wide database administered by BellSouth. In order to insure free or reduced intra-county for eligible users, STMC will submit on a **bi-monthly** basis to BellSouth the end user(s) 10-digit telephone number and TAR Code for inclusion this statewide file.

This will allow us to identify the user(s) 10-digit telephone number and TAR Code that may potentially be charged. Using this method, STMC will drop any/all related toll charges to the above mentioned customers that would otherwise be charged.

- b) No technical, operational, administrative or other difficulties have been encountered while attempting to apply with Tenn. Code Ann. 65-21-114(a).
- c) No suggestions at this time.

Respectfully,

Sandie Bower
Business Operations Officer
Skyline Telephone Membership Corp.



101 Market St., Suite 700
San Francisco, CA 94105
www.workingassets.com

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2003 OCT -6 AM 11:49

T.R.A. DOCKET ROOM

October 3, 2003

Director Ron Jones, Workshop Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
VIA FACSIMILE 615-741-5015

RE: Docket 03-00502, Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. §65-21-114

To Director Ron Jones:

Working Assets Funding Service, Inc. dba Working Assets Long Distance ("Working Assets") operates as an interexchange telecommunications reseller within the State of Tennessee. Our underlying carrier is Sprint Communications, Inc. ("Sprint").

To date, our underlying carrier has not yet been able to provide us with a cost effective automated method for flagging intracounty toll records. In the rare instance that an intracounty call is billed on our system, we have instructed our customer service representatives to credit the amount of the call and escalate the issue to our Carrier Relations Department for further investigation and resolution.

As a non-facilities based reseller, Working Assets believes that the best method for ensuring that intracounty toll calls are not billed to TN end users is to require wholesale carriers to drop the calls prior to sending billing files to their retailers.

Sincerely,

A handwritten signature in dark ink, appearing to read "Walter H. McGee".

Walter McGee
Regulatory Manager